

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

PETER STROJNIK,

Plaintiff,

v.

**ALBUQUERQUE BOCA HOTEL, LP
dba CROWN PLAZA HOTEL,**

Defendant.

**No. 1:20-cv-00843 WJ/GBW
No. 1:20-cv-00875 WJ/GBW
No. 1:20-cv-00938 WJ/GBW
No. 1:20-cv-00940 WJ/GBW
No. 1:20-cv-00998 WJ/GBW
No. 1:20-cv-01034 WJ/GBW
No. 1:20-cv-01325 WJ/GBW**

Consolidated

**JOINT MOTION TO DISMISS WITH
PREJUDICE**

Plaintiff Peter Strojnik and Defendant TRM & BAPA Investment, LLC file this Joint Motion to Dismiss with Prejudice asking this Court to dismiss with prejudice all claims Plaintiff Strojnik against TRM & BAPA Investment, LLC in this matter. In support of this Motion, the parties state the following:

1. Plaintiff Strojnik and Defendant TRM & BAPA Investment, LLC have executed a Settlement Agreement which resolves the issues in dispute herein.
2. All terms of the Settlement Agreement having been complied with and all payments made thereunder, dismissal is appropriate.
3. The parties stipulate to the dismissal, with prejudice, of this case, with each party to bear its own costs and attorneys' fees.

WHEREFORE, the parties respectfully request that this case be dismissed in its entirety, with prejudice.

Respectfully submitted,

HINKLE SHANOR LLP

By: /s/ Jaclyn M. McLean
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Electronic approval 9/6/21
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CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2021, I filed the foregoing pleading electronically through the Court's electronic filing system (CM/ECF), which caused all parties or counsel of record to be served by electronic means, as more fully reflected in the Notice of Electronic Filing.

/s/ Jaclyn M. McLean
Jaclyn M. McLean